

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, ET AL.,

Plaintiffs,

v.

AMERICAN AIRLINES GROUP INC. and  
JETBLUE AIRWAYS CORPORATION,

Defendants.

Civil Action No. 1:21-cv-11558-LTS

**MOTION FOR ENTRY OF DEFENDANTS' [PROPOSED] UNOPPOSED  
STIPULATED ORDER ON WIND-DOWN PLAN  
PURSUANT TO THE COURT'S FINAL JUDGMENT**

Pursuant to Section III.D of the Final Judgment and Order Entering Permanent Injunction, dated July 28, 2023 ("Final Judgment"), Defendants American Airlines Group Inc. and JetBlue Airways Corporation submit the enclosed Defendants' [Proposed] Unopposed Stipulated Order On Wind-Down Plan Pursuant to the Court's Final Judgment (the "Proposed Order") setting forth the "proposed wind-down plan for [the] expeditious and orderly termination of all Slot Lease Agreements related to the NEA and Airport Infrastructure sharing agreements related to the NEA," as those capitalized terms are defined in the Final Judgment. Plaintiffs have informed Defendants that they consent to entry of the Proposed Order.

WHEREFORE, Defendants respectfully request that the Court enter the Proposed Order, attached hereto as Exhibit A.

Dated: September 29, 2023

Respectfully submitted,

/s/ Christopher S. Yates

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### **LOCAL RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7.1(a)(2), I hereby certify that counsel have conferred regarding the relief requested in this motion, and Plaintiffs support entry of the Proposed Stipulated Order.

/s/ Christopher S. Yates  
Christopher S. Yates

### **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document, which was filed with the Court through the CM/ECF system, will be sent electronically to all registered participants as identified on the Notice of Electronic Filing.

/s/ Christopher S. Yates  
Christopher S. Yates